

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN

VALERIE KLOOSTERMAN

Plaintiffs

Civil Action No. 1:22-cv-00944

Hon. Jane M. Beckering

v.

METROPOLITAN HOSPITAL, d/b/a  
UNIVERSITY OF MICHIGAN HEALTH-WEST;  
RAKESH PAI, an individual; RHAE-ANN  
BOOKER, an individual; MARLA COLE, an  
individual; THOMAS PIERCE, an individual; and  
CATHERINE SMITH, an individual.

Defendants.

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**CERTIFICATE OF CONCURRENCE**

In accordance with Western District of Michigan Local Civil Rule 7.1(d), counsel for Defendants contacted Plaintiff's counsel by email on February 17, 2023, to request concurrence regarding Defendants' Motion For Protective Order To Stay Discovery Pending Resolution Of Their Motions To Dismiss ("Motion to Stay") and had other discussions regarding the same by phone. Counsel for Plaintiff states that Plaintiff does not oppose the stay, but reserves the right to file a brief response statement indicating that her non-opposition does not waive her right to oppose Defendants' assertions of entitlement to Eleventh Amendment immunity.

Respectfully submitted,

HALL RENDER KILLIAN HEATH & LYMAN, PC

/s/ Jonathon A. Rabin

Jonathon A. Rabin (P57145)

Larry R. Jensen (P60137)

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